

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>SADEEN JONES,</b>	:	
	:	
<b>Plaintiff</b>	:	
	:	<b>No. 1:21-CV-1715</b>
<b>v.</b>	:	
	:	<b>Judge Wilson</b>
<b>MARK C. GARMAN, CAPTAIN</b>	:	
<b>VANGORDER, LT. VANCE, LT.</b>	:	<b>Electronically Filed Document</b>
<b>SHERMAN, LT. STOVER and C.O. J.</b>	:	
<b>NICHOLAS,</b>	:	<i>Complaint Filed 10/07/21</i>
<b>Defendants</b>	:	

**STATEMENT OF UNDISPUTED MATERIAL  
FACTS IN SUPPORT OF SUMMARY JUDGMENT**

The Defendants, Garman, Vangorder, Vance, Sherman, Stover, and Nicholas, hereby file this Statement of Undisputed Material Facts in support of their Motion for Summary Judgment, as follows.

1. Sadeen Jones, the *pro se* Plaintiff in this action (hereinafter “Plaintiff”), was incarcerated at the State Correctional Institution at Rockview (hereinafter “SCI-Rockview”) in July of 2019. *See* Cell History of Plaintiff, attached as Exhibit A.
2. After a visit on July 21, 2019, Plaintiff was placed in a dry cell. *See* Transcript of Deposition of Plaintiff, attached as Exhibit B, 7:25, 8:1-13.

3. Plaintiff was investigated for possession of contraband and possession of a dangerous substance, based on events of July 21, 2019. *See* Misconduct D370858, attached as Exhibit C.
4. Plaintiff received a misconduct for possession of contraband and possession of a dangerous substance, based on a cell search on July 22, 2019. *See* Misconduct D110222, attached as Exhibit D.
5. Plaintiff pled guilty to misconduct D110222. Exhibit B, 10:24-25, 11:1.
6. Plaintiff did not appeal any misconducts. Exhibit B, 24:20-23.
7. Plaintiff's placement in a dry cell was based on credible information that he was introducing illegal drugs into the prison; this information was confirmed when his cell was searched. He remained in the dry cell for this reason, based on the belief that he had ingested these substances, where his urine and bowel movements were monitored. *See* Declaration of Jack Vangorder, attached as Exhibit E.
8. Plaintiff was checked by medical every two hours during his time in the dry cell. *See* Medical Records, attached as Exhibit F; *see also* Grievance 817992, attached as Exhibit G, p. 1.

**Respectfully submitted,**

**MICHELLE A. HENRY**  
**Attorney General**

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**Date: March 14, 2024**

**By: s/ Jonathan M. Blake**

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**Senior Deputy Attorney General**  
**Attorney ID 307030**

**KAREN M. ROMANO**  
**Chief Deputy Attorney General**  
**Civil Litigation Section**

**Counsel for Defendants**

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<b>Defendants</b>	:	

**CERTIFICATE OF SERVICE**

I hereby certify that on March 14, 2024, I caused to be served a true and correct copy of the foregoing document titled Statement of Undisputed Material Facts in Support of Summary Judgment to the following:

**VIA U.S. MAIL**

**Smart Communications/PADOC**

**Sadeen Jones, DW-1963**

**SCI – Coal Township**

**PO Box 33028**

**St. Petersburg, FL 33733**

*Pro Se Plaintiff*

*s/ Jonathan M. Blake*  
**JONATHAN M. BLAKE**  
Senior Deputy Attorney General